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December 6, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Ex Parte* Notification  
ET Docket No. 98-153/  
Ultra-Wideband

Dear Ms. Salas:

This is to note that on December 6, 2000, Jeff Ross and Rachel Reinhardt of Time Domain Corporation accompanied by Mimi Dawson and David Hilliard of Wiley, Rein & Fielding briefed Commissioner Susan Ness and her Senior Legal Advisor Mr. Mark Schneider about major testing efforts underway in this proceeding.

We explained that we understood that NTIA has said that it expects its non-GPS test results to be available in mid-January and that its GPS test results are expected in during February. We noted that Department of Transportation on October 30, 2000, filed a report on the testing conducted for it by Stanford University. We also noted that the Applied Research Laboratories: The University of Texas at Austin (ARL:UT) informed the Commission in October that the results of its testing were available (see *Ex Parte* Notice of October 10, 2000, submitted by Miguel Cardoza of ARL:UT). The ARL:UT data are available for downloading as explained by Mr. Cardoza. The testing performed by ARL:UT has been underwritten in large part by Time Domain, but the test plan used has been vetted publicly and is under the control of ARL:UT. We noted that additional testing to be performed outdoors by ARL:UT has been delayed because of rain, but that the data from these tests are expected to be available by mid-December.

Ms. Reinhardt and Mr. Ross explained that Time Domain has contracted with the Applied Physics Laboratory of The Johns Hopkins University (APL:JHU) to analyze the ARL:UT data and that APL:JHU would have control over the analysis. Finally, we noted Time Domain's concerns with any testing methodology that would inject white noise up to the predetermined limit of interference and then back off that noise slightly before injecting the UWB signal. We questioned whether such an approach realistically depicts the conditions likely to occur. We also questioned testing approaches that failed to present the GPS receiver with a full constellation of satellite signals representative of what could be expected to be received. With respect to non-GPS testing, we explained that we understood that the NTIA efforts were to focus on operations in four of the restricted bands between 1 and 4 GHz.

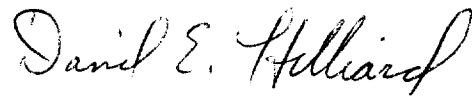
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Should any questions arise concerning this matter, please contact me.

Respectfully,

A handwritten signature in black ink, reading "David E. Hilliard". The signature is written in a cursive, flowing style.

David E. Hilliard  
Counsel for Time Domain Corporation

cc: The Honorable Susan Ness  
Mark Schneider, Esq.